

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

S&L PARTNERSHIP, a New York partnership,
CARLA GOLDWORM, TRUST FOR THE
BENEFIT OF SAMUEL GOLDWORM, a New
York trust, SAMUEL GOLDWORM, as trustee
and as an individual, TRUST FOR THE BENEFIT
OF LUKE GOLDWORM, a New York trust, and
LUKE GOLDWORM, as trustee and as an
individual,

Defendants.

Adv. Pro. No. 10-04702 (CGM)

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL OF
ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq. (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through his counsel, Baker & Hostetler LLP, and

defendants S&L Partnership, Carla Goldworm, Trust for the Benefit of Samuel Goldworm, Samuel Goldworm, Trust for the Benefit of Luke Goldworm and Luke Goldworm (collectively, “Defendants”), by and through their counsel, Dentons US LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 1, 2010, the Trustee filed the Complaint against Defendants [Dkt. No. 1].
2. On April 17, 2014, Defendants filed an Answer and Affirmative Defenses [Dkt. No. 33].
3. Pursuant to the Settlement Procedures Order entered by this Court on November 12, 2010 [Madoff Dkt. No. 3181], the Parties entered into a Settlement Agreement and Release on November 19, 2021.
4. Pursuant to the terms of the Settlement Agreement and Release, and in accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee’s claims against Defendants in the above-captioned adversary proceeding and dismissal of the adversary proceeding with prejudice, with all Parties to bear their own attorneys’ fees and costs.
5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.
6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall

be deemed an original.

Dated: November 22, 2021
New York, New York

Of Counsel:

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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and for the
Chapter 7 Estate of Bernard L. Madoff*

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Attorneys for Defendants

**Dated: November 23, 2021
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge**